

7. CHANGES TO REMEDIAL DESIGN/REMEDIAL ACTION SCOPE OF WORK AND GROUP 2 RD/RA WP

The OU 1-10 RD/RA SOW describes the preparation of two RD/RA WPs for OU 1-10, one for Group 1 sites and the other for Group 2 sites. The OU 1-10 RD/RA WP for Group 1 sites has been approved through the FFA/CO process by the Agency managers in accordance with the schedule in the RD/RA SOW. For several reasons, the Agency managers agreed that remedial design and subsequent remedial action should progress quickly for the V-Tanks. To implement this process, the Agencies agreed that the Group 2 RD/RA WP only address the V-Tanks and that a subsequent RD/RA WP be developed to address remaining OU 1-10 sites, which include the TSF-03 and WRTF-01 Burn Pits and the tank contents removal at the PM-2A Tanks (TSF-26). It was agreed that these remaining sites would be known as the Group 3 sites.

The creation of the Group 3 RD/RA WP to address the PM-2A Tanks and the Burn Pits does not have an enforceable milestone for the draft document submittal in the OU 1-10 RD/RA SOW because the creation of the Group 3 RD/RA WP occurred after finalization of the OU 1-10 RD/RA SOW. Rather than revise the OU 1-10 RD/RA SOW, the Agency project managers agreed to establish an enforceable milestone for the draft submittal of the Group 3 RD/RA WP in this Group 2 RD/RA WP, which is a primary document under the FFA/CO. In addition, this Group 2 RD/RA WP details the project's working schedule for the development of the Group 3 RD/RA WP. Table 7-1 shows the schedule for the development of the Group 3 RD/RA WP and includes both the project working schedule and the enforceable milestone.

Table 7-1. Working schedule and enforceable milestones for the Group 3 RD/RA WP development.

Activity	Planned Start Date	Planned Completion Date	Enforceable Completion Date
Remedy Selection for Burn Pits (Native Soil Cover or Excavate and Dispose)	10/01/2002	12/31/2002	—
Submittal of Draft OU 1-10 Group 3 RD/RA WP to Agencies	06/16/2003	06/16/2003	09/30/2004 ^a
Agencies Review of Draft Group 3 RD/RA WP	06/17/2003	08/01/2003	— ^b
Prepare Draft Final OU 1-10 Group 3 RD/RA WP	08/04/2003	09/18/2003	— ^b
Agencies Review of Draft Final Group 3 RD/RA WP	09/19/2003	10/06/2003	— ^b
Prepare Final OU 1-10 Group 3 RD/RA WP	10/17/2003	10/22/2003	— ^b
OU 1-10 Group 3 RD/RA WP Finalized	11/05/2003	11/05/2003	— ^{b, c}

a. Enforceable milestone established by this Group 2 RD/RA WP. Funding uncertainty in outyears has been considered to establish this milestone.

b. Review periods consistent with Section 8.13 of the FFA/CO (DOE-ID 1991).

c. An additional two weeks are allowed for printing and compilation of finalized documents.

The Group 3 RD/RA WP will address the remedial design and remedial action to implement the selected remedy at three OU 1-10 sites: (1) PM-2A Tanks (TSF-26), (2) WRRTF Burn Pits (WRRTF-01), and (3) TSF Burn Pit (TSF-03). The Group 1 RD/RA WP addresses the remedial action for the surficial soils at the PM-2A Tanks, and the Group 3 RD/RA WP will address the remedial action for contaminated soils that are beyond the scope of the Group 1 RD/RA WP. For the PM-2A Tanks, the Group 3 RD/RA WP will also address the tank contents removal phase of the work to implement the remedy from the OU 1-10 ROD. For the two Burn Pits sites, WRRTF-01 and TSF-03, the Group 3 RD/RA WP will address the implementation of the selected remedy, Native Soil Cover, or the contingent remedy, Excavate and Dispose. The selection of the remedy will be based upon evaluation of post-ROD sampling that was conducted at the Burn Pits to determine the most cost-effective remedy.

The OU 1-10 RD/RA SOW also stated that the enforceable milestone for submittal of the remedial action report would be determined and documented in the Group 2 RD/RA WP. Because of the creation of the Group 3 RD/RA WP, the Agency project managers agree that the enforceable milestone for submittal of the remedial action report will not be determined and documented until the Group 3 RD/RA WP.

8. INSTITUTIONAL CONTROLS, OPERATIONS AND MAINTENANCE, AND FIVE-YEAR REVIEW

This section presents a summary of the activities planned after the remedial action, which includes institutional controls, operations and maintenance, and the 5-year review of site conditions.

8.1 Institutional Controls

Institutional controls have been implemented at the V-Tanks sites in accordance with the *Institutional Control Plan for the Test Area North Waste Area Group 1* (DOE-ID 2000e). No activities throughout the course of the remedial action are expected to modify the institutional control requirements for these sites (TSF-09 and TSF-18). Following completion of the entire remedial action activities for the V-Tanks, the institutional control requirements will be reevaluated. Changes, if necessary, will be made to the WAG 1 Institutional Control Plan, following Agency project manager review of the proposed changes. These institutional control changes will be implemented for the V-Tanks sites following agreement by the Agency project managers.

8.2 Operations and Maintenance

Operations and maintenance activities for the V-Tanks sites are covered in the *Operations and Maintenance Plan for the Test Area North Waste Area Group 1* (DOE-ID 2000b). Operations and maintenance activities are not expected to change for the V-Tanks throughout the duration of the remedial action. Following full restoration of the site, any changes to operations and maintenance requirements will be made. These changes, if necessary, will be reviewed by the Agency project managers and will be implemented.

8.3 Five-Year Review

In accordance with the *National Oil and Hazardous Substances Pollution Contingency Plan* (EPA 1990) for sites where contamination is left in place above health-based levels, a review will be conducted within five years from the initiation of construction activities at OU 1-10 to ensure that the remedy and institutional controls are still effective in protecting human health and the environment. Subsequent 5-year reviews will be completed within five years of the previous review. The reviews will be used to assess the need for future long-term environmental monitoring and administrative/institutional controls. Five-year reviews will be conducted for the remediated sites with institutional controls until 2099 (i.e., until the 100-year institutional control period expires) or until it is determined that the site no longer poses a risk to human health or the environment.

The V-Tanks remedial action will occur over several years. Institutional controls may be required during the phased remedial action and upon completion of the remedy based on contaminant levels remaining onsite. Should contamination above unrestricted land use concentrations exist, institutional controls will be implemented. The Institutional Control Plan (DOE-ID 2000e) identifies the types of controls that may be implemented. The Institutional Control Plan (DOE-ID 2000e) and O&M Plan (DOE-ID 2000b) address the inspections during the first five years after the remedial action. Inspection details and inspection checklists are provided in these plans. After the first 5-year review, the Agencies may revise the inspection frequency. Further requirements for 5-year reviews will be developed and addressed in a revision to the O&M Plan (DOE-ID 2000b).

9. REFERENCES

- 42 USC 9601 et seq., 1986, "Comprehensive Environmental Response, Compensation, and Liability Act of 1980," as amended by the "Superfund Amendments and Reauthorization Act of 1986."
- Blackmore, 1998, Memo from C. S. Blackmore, INEEL, to J. T. Taylor, INEEL, Idaho Falls, March 10, 1998, "Criticality Safety Issues Associated with the TAN V-Tanks," CSB-004-98.
- DOE, 1989, *The Idaho National Engineering Laboratory Sampling and Analysis Data Document*, ORNL/TM-11239, Draft, Vol. 1, September 1989.
- DOE-ID, 1991, *Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory*, U.S. Department of Energy Idaho Operations Office, U.S. Environmental Protection Agency Region 10, and State of Idaho Department of Health and Welfare, Administrative Docket 1088-06-120, December 9, 1991.
- DOE-ID, 1997, *Comprehensive Remedial Investigation/Feasibility Study for the Test Area North, Operable Unit 1-10 at the Idaho National Engineering and Environmental Laboratory*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10557, Revision 0, November 1997.
- DOE-ID, 1998, *Field Sampling Plan for Test Area North TSF-09, TSF-18, and TSF-26 Area Soils*, DOE/ID-10635, Revision 0, June 1998.
- DOE-ID, 1999, *Final Record of Decision for Test Area North, Operable Unit 1-10*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10682, Revision 0, December 1999.
- DOE-ID, 2000a, *TAN WAG 1 OU 1-10 Remedial Design/Remedial Action Scope of Work*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10723, Revision 0, February 2000.
- DOE-ID, 2000b, *Operations and Maintenance Plan for Test Area North, Operable Unit 1-10*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10711, Revision 0, August 2000.
- DOE-ID, 2000c, *Field Sampling Plan for the V-Tanks, TSF-09/18, at Waste Area Group 1, Operable Unit 1-10 Remedial Action*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10794, Revision 0, November 2000.
- DOE-ID, 2000d, *Quality Assurance Project Plan for Waste Area Groups 1, 2, 3, 4, 5, 6, 7, 10, and Inactive Sites*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10587, Revision 6, September 2000.
- DOE-ID, 2000e, *Institutional Control Plan for the Test Area North Waste Area Group 1*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10724, September 2000.
- DOE-ID, 2001a, *Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10908, Revision 0, November 2001.
- DOE-ID, 2001b, *Confirmation Field Sampling Plan for the V-Tanks, TSF-09/18, at Waste Area Group 1, Operable Unit 1-10 Remedial Action*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10876, June 2001.

- EDF-ER-325, 2001, "Calculation of the 99% upper confidence limits for U-235 and U-238 in Test Area North Tank V-9 (TSF-18), sampling for Operable Unit 1-10 to address criticality safety issue resolution," Idaho National Engineering and Environmental Laboratory, October 2001.
- EPA, 1988, *Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA*, Interim Final, EPA/540/G-89/004, October 1988.
- EPA, 1990, "National Oil and Hazardous Substances Pollution Contingency Plan," *Federal Register*, Volume 55, U.S. Environmental Protection Agency, 1990 (currently available at 40 CFR 300).
- Hain, K. E., Department of Energy Idaho Operations Office, to W. Pierre, Environmental Protection Agency, Region X, and D. Nygard, Idaho Department of Health and Welfare, November 3, 1998, Subject: "Transmittal of Analytical Results and Limitations and Validation Reports for WAG 1 Surface Soil Sampling at the V-Tank and PM-2A Tank Sites." OPE-ER-169-98
- IDEQ, 2000, B. R. Monson, IDEQ, to D. N. Rasch, DOE-ID, "Enclosure: Consent Order," Idaho Code 39-4413, June 14, 2000.
- INEEL, 1998, *INEEL Emergency Plan/RCRA Contingency Plan*, Idaho National Engineering and Environmental Laboratory, PLN-114, Companywide Manual 16A, current version.
- INEEL, 2001a, *Voluntary Consent Order NEW-TAN-008 System Identification, TAN-616 Liquid Waste Treatment System*, Idaho National Engineering and Environmental Laboratory, INEEL/EXT-2000-01263, Revision 1, June 2001.
- INEEL, 2001b, *Characterization and Decision Analysis Report for TAN-616 Liquid Waste Treatment Facility*, Idaho National Engineering and Environmental Laboratory, INEEL/EXT-01-00029, Revision 0, May 2001.
- INEEL, 2001c, *Tank V-1, V-2, V-3, and V-9 (TSF-09 and TSF-18) Health and Safety Plan, Waste Area Group 1, Operable Unit 1-10 Remedial Design*, Idaho National Engineering and Environmental Laboratory, INEEL/EXT-01-00532, 2001.
- INEEL, 2001d, *Waste Management Plan for the V-Tanks, TSF-09/18, at Waste Area Group 1, Operable Unit 1-10 Remedial Action*, Idaho National Engineering and Environmental Laboratory, INEEL/EXT-01-00759, 2001.
- INEL, 1994, *Preliminary Scoping Track 2 Summary Report for the Test Area North Operable Unit 1-05: Radioactive Contamination Sites*, Idaho National Engineering Laboratory, INEL-94/0135, Revision 0, October 1994.
- MCP-7, June 2001, "Radiological Work Permit," Revision 15, *Manual 15b-Radiation Protection Procedures*, Radiation Protection.
- MCP-62, July 1999, "Waste Generator Services-Conditional Industrial Waste Management," Revision 2, *Manual 17-Waste Management*, Environmental Protection and Compliance.
- MCP-69, December 2000, "Waste Generator Services-Hazardous Waste Management," Revision 3, *Manual 17-Waste Management*, Environmental Protection and Compliance.

MCP-70, December 2000, "Waste Generator Services—Mixed Low-Level Waste Management," Revision 4, *Manual 17-Waste Management*, Environmental Protection and Compliance.

MCP-124, July 2000, "Response to Abnormal Radiological Situations," Revision 3, *Manual 15B-Radiation Protection Procedures*, Radiation Protection.

MCP-187, September 2000, "Posting Radiological Control Areas," Revision 8, *Manual 15B-Radiation Protection Procedures*, Radiation Protection.

MCP-227, August 2001, "Sampling and Analysis Process for CERCLA and D&D Activities," Revision 8, *Manual 18-Closure Management*, Environmental Restoration.

MCP-230, June 1996, "Environmental Restoration Document Control Interface," Revision 5, *Environmental Restoration Management Control Procedures Manual*, Environmental Restoration.

MCP-231, July 2000, "Logbooks," Revision 4, *Manual 18-Closure Management*, Environmental Protection and Compliance.

MCP-241, August 1996, "Preparation of Characterization Plans," Revision 2, *Environmental Restoration Management Control Procedures Manual*, Environmental Protection and Compliance.

MCP-244, September 1999, "Chain-of-Custody, Sample Handling, and Packaging for CERCLA Activities," Revision 3, *Manual 18-Closure Management*, Environmental Restoration.

MCP-425, July 2000, "Radiological Release Surveys and the Disposition of Contaminated Materials," Revision 4, *Manual 15B-Radiation Protection Procedures*, Radiation Protection.

MCP-540, March 2001, "Documenting the Safety Category of Structures, Systems, and Components," Revision 13, *Manual 10A-Engineering and Research*, Quality.

MCP-557, July 2001, "Managing Records," Revision 6, *Manual 1-General Administration and Information*, General Administration and Information.

MCP-2742, February 2001, "Temporary Facilities," Revision 1, *Manual 14A-Safety and Health-Occupational Safety and Fire Protection*, Safety and Fire Protection.

MCP-2783, March 2000, "Startup and Restart of Nuclear Facilities," Revision 3, *Manual 9-Operations*, Operations.

MCP-2864, September 1999, "Sample Management," Revision 3, *Manual 18-Closure Management*, Environmental Restoration.

MCP-3449, June 2001, "Safety and Health Inspections," Revision 2, *Manual 14A-Safety and Health-Occupational Safety and Fire Protection*, Safety and Fire Protection.

MCP-3472, August 1999, "Identification and Characterization of Environmentally Regulated Waste," Revision 0, *Manual 17-Waste Management*, Waste Management.

MCP-3475, September 1999, "Temporary Storage of CERCLA-Generated Waste at the INEEL," Revision 1, *Manual 18-Closure Management*, Environmental Protection and Compliance.

MCP-3562, April 2001, "Hazard Identification, Analysis, and Control of Operational Activities," April 2001, Revision 3, *Manual 9-Operations*, Operations.

Nielsen, 2001, Memo from J. W. Nielsen, INEEL, to R. G. Peatross, INEEL, October 10, 2001, "Criticality Issues Associated with the Removal of the Material from Tank V-9," JWN-03-01.

PLN-114, July 2001, "INEEL Emergency Plan/RCRA Contingency Plan," Revision 16, *Manual 16A-Emergency Preparedness Base Plan*, Emergency Preparedness.

PRD-160, April 2000, "Hoisting and Rigging," Revision 2, *Manual 14A-Safety and Health-Occupational Safety and Fire Protection*, Safety and Fire Protection.

PRD-183, "Radiation Protection—INEEL Radiological Control Manual," *Manual 15A—Radiation Protection—INEEL Radiological Control Manual*. PRD-5006, April 2001, "Subcontractor/Supplier Quality Plan," Revision 1, *Subcontractor Requirements Manual*, Quality Department.

PRD-1007, May 2000, "Work Coordination and Hazard Control," Revision 4, *Subcontractor Requirements Manual*, Project and Construction Management.

PRD-2007, April 2000, "Hoisting and Rigging," *Subcontractor Requirements Manual*, Revision 1, Project and Construction Management.

PRD-2012, June 2001, "Lockout and Tagout," Revision 2, *Subcontractor Requirements Manual*, Project and Construction Management.

PRD-2014, June 2001, "Excavations and Surface Penetrations," *Subcontractor Requirements Manual*, Project and Construction Management.

PRD-5006, April 2001, "Subcontractor/Supplier Quality Plan," Revision 1, *Subcontractor Requirements Manual*, Quality.

WESTON, 2001a, *Decontamination Plan, V-Tanks, Waste Area Group 1, Operable Unit 1-10 Remedial Action*, Roy F. Weston, Inc., 2001.

WESTON, 2001b, *Tanks V-1, V-2, and V-3 (TSF-09) and Tank V-9 (TSF-18) Health and Safety Plan, Waste Area Group 1, Operable Unit 1-10*, Roy F. Weston, Inc., 2001.

WESTON, 2001c, *Subcontractor Quality Plan – Treatment and Disposal of V-Tank Wastes and Associated Equipment*, Roy F. Weston, Inc., 2001.